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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 RAMON VICENTE GONZALEZ,
15 Defendant.

Case No. 2:07-cr-083-RCJ-RJJ

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Fifth Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Raquel Lazo, Assistant Federal Public Defender, counsel for Ramon Vicente Gonzalez,
21 that the Revocation Hearing currently scheduled on January 11, 2021 at 11:45 am, be vacated
22 and continued to a date and time convenient to the Court, but no sooner than March 19, 2021.

23 This Stipulation is entered into for the following reasons:

24 1. Since the last requested continuance, probation has continued to monitor
25 Mr. Gonzalez's progress. Mr. Gonzalez remains compliant and in continued treatment with
26 drug testing. Mr. Gonzalez also remains in frequent contact with his probation officer.

1 2. The parties request that this hearing be continued to provide Mr. Gonzalez a
2 continued opportunity to stay compliant until he expires his term of supervised release on March
3 19, 2021. Assuming Mr. Gonzalez stays violation free, the parties will seek to dismiss the
4 petition at the next hearing.

5 3. Mr. Gonzalez is not in custody and agrees with the need for the continuance.

6 4. The parties, including the probation officer, agree to the continuance.

7 This is the fifth request for a continuance of the revocation hearing.

8 DATED this 19th day of December, 2020.

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10 RENE L. VALLADARES
11 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

12 /s/ Raquel Lazo
13 By _____
14 RAQUEL LAZO
15 Assistant Federal Public Defender

/s/ Kimberly M. Frayn
By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

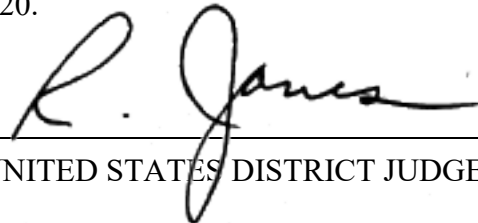
3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 RAMON VICENTE GONZALEZ,
7 Defendant.
8

Case No. 2:07-cr-083-RCJ-RJJ

ORDER

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for Monday, January 11, 2021 at 11:45 a.m., be vacated and continued to Monday, March
12 22, 2021 at the hour of 10:00 a.m..

13 DATED this 21st day of December, 2020.

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16 UNITED STATES DISTRICT JUDGE
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